

November 14, 2004

The Honorable Ann Veneman
Agriculture Secretary
United States Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Dear Secretary Veneman:

The State of California appreciates the opportunity provided by the U.S. Department of Agriculture (USDA) Forest Service to review the existing management requirements for inventoried roadless areas within the state's 18 National Forests and if warranted, to petition the Department to establish or adjust management requirements. Existing and future management of all National Forest System (NFS) lands—regardless of management designation—is very important to states. Consistent with Governor Schwarzenegger's belief that states must play a stronger role with federal land management agencies to achieve coordinated and comprehensive resource stewardship that can be thoughtfully implemented, we commend the Bush administration for understanding the value that closer partnerships with states can offer for the future of our National Forests.

As promulgated by 36 CFR Part 294, 'Special Areas; State Petitions for Inventoried Roadless Area Management', there is a long and complex history to the planning for inventoried roadless areas within the National Forests. After a careful review of the proposed regulations, we believe that the most prudent method to address the future management of roadless areas in the State of California is by working closely with the individual National Forests as they revise the land management plans in future years.

The 4.4 million acres of NFS roadless area in our state are treasured by Californians for the many benefits they provide us in terms of recreational opportunities, open space, wildlife habitats and water quality. They are also a part of our landscape under many different ownership regimes where environmental threats such as damaging wildfires, invasive species, and poorly maintained roads do not stop at property boundaries.

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The extent and diversity of the USDA Forest Service roadless areas in California demands a thorough and open planning process to address the benefits and costs of different management strategies. We believe this process can most effectively be done by each of the National Forests addressing the full suite of issues surrounding roadless areas as they revise their land management plans.

The State of California will actively participate in these Forest-specific processes to ensure that the interests of our citizens are addressed. We also feel the National Forest-specific planning exercises will be the most effective way to reach the unique needs of local stakeholders.

As we approach working with individual National Forest plan revisions we would like to emphasize four points for your consideration:

- 1) The 'inventoried roadless area' maps are out of date or inaccurate in some areas; hence the maps need to be updated and field verified by the USFS as part of the review process.
- 2) There will be a need to grandfather in 'unofficial roads' into roadless areas such as those noted by Native American tribes in the eastern Sierra Nevada that are used by tribal elders to reach sacred sites.
- 3) To the extent practical, bad roads should be decommissioned.
- 4) Limitations associated with roadless status should not unreasonably detract from the ability of the USFS or its cooperators to effectively to deal with wildland fire protection; current policies reflect this position and so should any future policy changes.

While not taking advantage of this petition process, the State of California will continue to take an active and keen interest in the future management of NFS lands for all the recreation, water quality, biodiversity, forest health, timber and fire protection benefits that the public deserves. Thank you again extending the courtesy to states to play a greater role determining the future of inventoried roadless areas.

Sincerely,



MIKE CHRISMAN
Secretary for Resources